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February 20, 2015

United States District Court
Eastern District of New York
225 Cadman Plaza East
Room 1217 (Chambers)
Brooklyn, New York 11201

Attention: Hon. Steven M. Gold
Chief Magistrate Judge

Re: Patrick Gill v. Christoph S. Bahlmann and Perini Corporation (United States District
Court, Eastern District of New York; Case Number 13-CV-04477-JG-SMG)
Our File Number: PZ-0015

Dear Chief Magistrate Judge Gold:

As you know, this law office represents the defendants, Christoph S. Bahlmann and Perini Corporation, in the above-referenced matter.

We are writing to request an extension of time to disclose one of defendants' orthopedic expert's reports, that of Dr. Jeffrey A. Goldstein. We have not yet obtained the report of his examination of plaintiff conducted on January 9, 2015, which we understand is, at least in part, a result of his busy surgery schedule. We are requesting, therefore, a two-week extension to March 6, 2015. This requested extension regarding the disclosure of Dr. Goldstein's report does not affect any other Court-ordered deadline or date.

All other medical examinations have been completed and the reports of those two physicians are being disclosed today.

We thank you in advance for the courtesy of your considering this application.

Respectfully submitted,


Kenneth Arthur Rigby (KR0266)

cc: David L. Scher, Esq.
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